

# Exhibit 4

**From:** [Andrapalliyal, Vinita B. \(CIV\)](#)  
**To:** [Melody, Colleen M \(ATG\)](#); [Daniel, Christian S. \(CIV\)](#)  
**Cc:** [McGinty, William \(ATG\)](#); [Heintz, Tera M. \(ATG\)](#); [Fraas, Lauryn \(ATG\)](#); [Sepe, Cristina \(ATG\)](#); [Hughes, Andrew \(ATG\)](#); [Luna, Neal \(ATG\)](#); [Wolf, Lucy \(ATG\)](#); [Allie.M.Boyd@doj.oregon.gov](#); [James.Canaday@ag.state.mn.us](#); [shannon.stevenson@coag.gov](#)  
**Subject:** RE: Violation of Court Orders re: Gender-Affirming Care Research  
**Date:** Thursday, March 6, 2025 8:42:55 AM

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[EXTERNAL]

Colleen,

Yesterday evening, in advance of the 48-hour deadline you requested, we explained why Defendants did not violate Judge King's order. We had hoped you would find our explanation sufficient. However, your most recent email indicates that you intend to litigate this issue. Accordingly, we provide our positions in response to your requests below.

Defendants oppose a contempt motion and intend to file an opposition because Defendants have not violated Judge King's order. We don't believe shortened time is necessary because the termination of this research grant does not cause the sort of imminent harm that requires expedited relief. However, as a courtesy, we would agree to shortened time provided Defendants can file their response brief by March 13. If you intend to file the request for shortened time as joint, consent, or unopposed, we request to see a draft of the request before it is finalized and filed. Finally, Defendants oppose any request for attorney's fees because, again, Defendants are not in violation of Judge King's order.

Relatedly, if the court wishes to hold a hearing on the motion, we request that the hearing be telephonic or by Zoom if possible, in light of counsel's recent cross-country travel for the two prior hearings in this case and Executive Order 14,222, entitled "Implementing the President's 'Department of Government Efficiency' Cost Efficiency Initiative."

Thank you,  
Vinita

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**From:** Melody, Colleen M (ATG) <colleen.melody@atg.wa.gov>  
**Sent:** Wednesday, March 5, 2025 6:26 PM  
**To:** Daniel, Christian S. (CIV) <Christian.S.Daniel@usdoj.gov>; Andrapalliyal, Vinita B. (CIV) <Vinita.B.Andrapalliyal@usdoj.gov>  
**Cc:** McGinty, William (ATG) <william.mcginity@atg.wa.gov>; Heintz, Tera M. (ATG) <tera.heintz@atg.wa.gov>; Fraas, Lauryn (ATG) <Lauryn.Fraas@ATG.WA.GOV>; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov>; Luna, Neal (ATG) <neal.luna@atg.wa.gov>; Wolf, Lucy (ATG) <lucy.wolf@atg.wa.gov>; Allie.M.Boyd@doj.oregon.gov; James.Canaday@ag.state.mn.us; shannon.stevenson@coag.gov  
**Subject:** [EXTERNAL] RE: Violation of Court Orders re: Gender-Affirming Care Research

Christian:

Having not heard from Defendants regarding the termination letter, please provide by 9am

PT tomorrow Defendants' position on a motion for contempt, shortened time, and attorneys' fees. On shortened time, we're planning to file our motion tomorrow and request that Defendants' response be due March 11, Plaintiffs' reply be due March 12, and that the motion note March 13.

Sincerely,

Colleen

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**From:** Melody, Colleen M (ATG)

**Sent:** Tuesday, March 4, 2025 11:48 AM

**To:** 'Daniel, Christian S. (CIV)' <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>

**Cc:** McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[Cristina.Sepe@atg.wa.gov](mailto:Cristina.Sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)>; [Allie.M.Boyd@doj.oregon.gov](mailto:Allie.M.Boyd@doj.oregon.gov); [James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us); [shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov)

**Subject:** RE: Violation of Court Orders re: Gender-Affirming Care Research

Christian:

NIH's cited basis for immediate termination of the grant is that "[r]esearch programs based on gender identity are often unscientific" and "ignore, rather than seriously examine, biological realities." That is the same reasoning, steeped in stereotype, that underlies the Gender-Ideology Order and Denial-of-Care Order. Restrictions on funding under Sections 3(e) and 3(g) of the Gender-Ideology Order and Section 4 of the Denial-of-Care Order are enjoined. For avoidance of any doubt, the Maryland injunction includes a prohibition on taking "any steps to implement, give effect to, or reinstate [the enjoined conduct] under a different name." Temporary Restraining Order at 2, *PFLAG v. Trump*, No. 8:25-cv-00337-BAH (D. Md. Feb. 13, 2025), ECF 61. And in violation of yet a third injunction, the termination letter contravenes an order of the Rhode Island District Court ordering HHS "not to pause any funds based on pronouncements pausing funding incorporated into the OMB Directive," including the Gender-Ideology Order. *New York v. Trump*, No. 25-cv-39-JJM-PAS (D.R.I. Feb. 10, 2025), ECF 96.

Based on all of this, when I sent my email yesterday, I expected Defendants to respond that this was an inadvertent mistake that NIH would promptly correct. I hope that is what you say next.

Sincerely,

Colleen

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**From:** Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>

**Sent:** Tuesday, March 4, 2025 10:41 AM

**To:** Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Andrapalliyal, Vinita B. (CIV)

<[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>

**Cc:** McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; [Allie.M.Boyd@doj.oregon.gov](mailto:Allie.M.Boyd@doj.oregon.gov); [James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us); [shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov)  
**Subject:** RE: Violation of Court Orders re: Gender-Affirming Care Research

[EXTERNAL]

Hi Colleen,

We are looking into the letter. Can you please explain why you believe it violates any court order?

Best,  
Christian

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**Christian Daniel**

Trial Attorney  
U.S. Department of Justice, Civil Division  
Federal Programs Branch  
Office: (202) 514-5838  
Cell: (202) 993-5173

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**From:** Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>

**Sent:** Monday, March 3, 2025 7:23 PM

**To:** Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>; Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>

**Cc:** McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; [Allie.M.Boyd@doj.oregon.gov](mailto:Allie.M.Boyd@doj.oregon.gov); [James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us); [shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov)

**Subject:** [EXTERNAL] Violation of Court Orders re: Gender-Affirming Care Research

Vinita, Christian:

Today, Washington became aware of the attached letter that was sent to Seattle Children's Hospital on February 28 terminating research into healthcare for transgender and gender-expansive youth. The grant description is [available here](#) and includes the development of a "gender-affirming intervention." This termination letter violated multiple injunctions at the time it was issued, including the temporary restraining orders in *Washinton v. Trump*, No. 2:25-cv-00244-LK (W.D. Wash. Feb. 14, 2025), and *PLAG v. Trump*, No. BAH-25-337 (D. Md. Feb. 13, 2025). Following the issuance of the preliminary injunction in *Washington v. Trump* on February 28, the letter is additionally in violation of that order.

Please confirm in writing within 48 hours that this termination letter has been withdrawn. Failure to confirm the same will result in emergency motions practice before Judge King.

Thank you,

Colleen

**Colleen Melody**

Wing Luke Civil Rights Division Chief  
Washington State Attorney General's Office  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-5342  
She/her